

1 SEYFARTH SHAW LLP
Kristina M. Launey (SBN 221335)
2 klauney@seyfarth.com
400 Capitol Mall, Suite 2350
3 Sacramento, California 95814
Telephone: (916) 448-0159
4 Facsimile: (916) 558-4839

5 SEYFARTH SHAW LLP
Myra B. Villamor (SBN 232912)
6 mvillamor@seyfarth.com
2029 Century Park East, Suite 3500
7 Los Angeles, California 90071
Telephone: (310) 277-7200
8 Facsimile: (310) 201-521

9 Attorneys for Defendant
WINCO FOODS, LLC

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 ROBERT KALANI,)	Case No. 2:16-CV-01931 WBS (ACx)
)	
14 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXTENDING DEFENDANT'S
15 v.)	DEADLINE TO RESPOND TO
)	PLAINTIFF'S COMPLAINT
16 WINCO FOODS, LLC, a Delaware limited)	
17 liability company, dba WINCO FOODS #103,)	[L.R. 144(A)]
)	
18 Defendant.)	
)	

20 Pursuant to the provisions of Local Rule 144(a), Plaintiff Robert Kalani ("Plaintiff") and
21 Defendant WinCo Foods, LLC ("Defendant"), by and through their respective counsel, hereby
22 stipulate that WinCo may have a 14-day extension of time in which to respond to Plaintiff's
23 Complaint. Pursuant to this extension, a response by Defendant shall be due on or before
24 October 12, 2016.

25 This stipulation will not affect or alter any deadline previously set by Court order.

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

The reason for the present extension is that WinCo is investigating the allegations to explore whether further litigation can be avoided.

Pursuant to Local Rule 131(e), counsel for Plaintiff has authorized submission of this document on her behalf.

DATED: September 28, 2016

SEYFARTH SHAW LLP

By /s/ Myra B. Villamor
Myra B. Villamor
Attorneys for Defendant
WinCo Foods, LLC

DATED: September 28, 2016

MOORE LAW FIRM, P.C.

By /s/ Tanya Moore
Tanya E. Moore
Attorneys for Plaintiff
Robert Kalani

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Based on the foregoing stipulation, IT IS SO ORDERED that the following deadline applies:

October 13, 2016

Deadline for Defendant to Respond to Complaint

Dated: September 29, 2016



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE